FILED: ROCKLAND COUNTY CLERK 04/03/2019 03:23 PM

NYSCEF DOC. NO. 22

INDEX NO. 031783/2019

RECEIVED NYSCEF: 04/03/2019

AFFIDAVIT OF T. AND M.M.

STATE OF NEW YORK) ss:s.
COUNTY OF ROCKLAND)

T. and M.M., having been duly sworn, hereby state and depose under the pains and penalties of perjury:

- 1. We three children who have been excluded from their schools since December 7th. T. is a self-employed woodworker and M. is a certified Waldorf teacher who works at the Otto Specht School.
- 2. We chose Waldorf education for our three children to be able to nourish their soul quality through its unique curriculum. In addition, we chose to live on the school campus to enhance our family culture and our children's friendship.
- 3. Ts grandfather is a monk from one of the oldest temples in Japan. He always believed the Buddhism principal, 'Illness and Wellness live together.' He believes that illness has important meanings itself. The human beings have healing ability. Therefore, he decided not to vaccinate our children. M. was raised in a Shinto family. She believes illnesses are affected by spirits. She further believes the vaccination will interfere with the children's relationship to the spirits or divine' will, and it will cause more complicated illness later in the children's life. Therefore, we decided not to vaccinate our children.
- 4. Our oldest daughter, Y, has been excluded from the Otto Specht School, which is a school for the children who have different learning styles. She is one of three six graders at the OSS, and now only one student who is excluded from the OSS. Independent learning is extremely difficult for Y. As she needs one-on-one supports very often, we are struggling to find an educational support for her during this exclusion.
- 5. N. is in the third grade at the Green Meadow Waldorf School. S. is in the Kindergarten at the Green Meadow Waldorf School. Both N. and S. lost

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good rhythm without much structure at home.

- 6. In addition to the academic difficulties, the social difficulties are extreme for us. Since we live in the middle of the school campus, the girls experienced prejudice from their own classmates who would tell them in front of the house that "You are not allowed to be here!" Also, they see the in-school children playing or walking with their teachers around our house all the time.
- 7. I, M., am facing tremendous stress as a teacher. I work at the Otto Specht School as a half-time teacher, and a half-time administrator. In the beginning of the exclusion, I stayed up until midnight almost every day to manage the teachers' schedules so that they could visit/tutor our excluded students. It continued only for two weeks, but it literally ruined my health. At least five teachers became sick to be absent during this period.
- 8. As our students gradually came back to the school, I no longer needed to work so many hours. Instead, I started feeling guilty for missing my own teaching time or leaving my own children unattended. I feel I'm always running in between my children and my students and cannot function very well any more. I also had my colleagues commented that I should not be walking around on campus with my children since it is violating the order for DOB.
- 9. As I mentioned earlier, it is impossible for us since we live in the middle of the school campus. I felt angry hearing this comment. I also had to give up teaching two of my students to be able to teach my own children. I became emotional when one student's teacher told me, "You have to explain to the student why you cannot teach him anymore." My [M.] self-esteem is going down and I am irritable all the time. In addition, I started feeling unsafe in my working environment recently. Both my work and living environment are not sustainable unless the exclusion is lifted right away. When exclusion is lifted, I hope to have a counseling so that I can sort out my feelings.
- 10. Our children our healthy, there are no cases of measles at either school our children attend. We live in a fairly closed community, meaning that we have a coop here for food and feel that the threat posed by measles is far less

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serious than the threat posed by our continued exclusion from the school we chose.

AM

T.M.

Signed and sworn to before me this ___ day of March 2019

NOTARY PUBLIC

MICHAEL HOWARD SUSSMAN Notary Public, State of New York No. 02SU6332584

My commission expires:

Qualified in Orange County \ \ \ \ \ Commission Expires Nov. 09, 20____

mm.

M.M.

Signed and sworn to before me this ____ day of March 2019.

NOTARY PUBLIC

My commission expires:

MICHAEL HOWARD SUSSMAN Notary Public, State of New York No. 02SU6332584 Qualified in Orange County Commission Expires Nov. 09, 20 15